

## **Remarks/Arguments**

### **I. Response to Rejections under 35 USC § 102**

At pages 2-5 of the Office Action, claims 1-5, 7, 9-17, 27-30, 32, and 33 are rejected under 35 USC§102(e) as being anticipated by "Ilan" (US Patent 6668081). However, Ilan does not disclose a method, system, computing device, or computer program storage device that includes the limitations of "dividing said touchpad into a plurality of regions and assigning a character to each of said regions" and "comparing said received sequence of characters with a predetermined sequence of characters", as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.) Support for these claim limitations can be found at page 8, lines 18-21 and as shown in Figure 7.

In Ilan, a pattern recognition system is disclosed. In Ilan, a touchpad pointing device is used as a pattern input device for a pattern recognition system. However, there is no mention in Ilan as to the technique used to convert the input pattern into a form that can be recognized by the computing device. Ilan shows (in Figure 4, for example) a character being traced on display, and even mentions a signal capturer (52), however, there is no mention of "dividing said touchpad into a plurality of regions and assigning a character to each of said regions" and "comparing said received sequence of characters with a predetermined sequence of characters", as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.)

Accordingly, as the Ilan reference does not disclose all of the limitations of the Applicants' claims, the Applicants respectfully request that the Examiner withdraw the rejection to the claims.

### **II. Response to Rejections under 35 USC § 103(a):**

At pages 6-9 of the Office Action, claims 18, 19, and 21-26 are rejected under 35 USC§103(a) as being unpatentable over by "Ilan" (as previously mentioned herein) in view of "Pirdy" (US patent 6,151,218). However, neither the Ilan nor the Pirdy reference, taken either singly or in combination therewith, suggest,

mention, or otherwise make obvious the claim limitations of “dividing said touchpad into a plurality of regions and assigning a character to each of said regions” and “comparing said received sequence of characters with a predetermined sequence of characters”, as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.)

As previously discussed, Ilan discloses a pattern recognition system in which a touchpad pointing device is used as a pattern input device. However, there is no mention in Ilan as to the technique used to convert the input pattern into a form that can be recognized by the computing device. Ilan shows (in Figure 4, for example) a character being traced on display, and even mentions a signal capturer (52), however, there is no mention of “dividing said touchpad into a plurality of regions and assigning a character to each of said regions” and “comparing said received sequence of characters with a predetermined sequence of characters”, as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.)

In Pirdy, a physical security system for portable computer/port replicator is disclosed. Pirdy includes a docking bay arrangement so that the portable computer's keyboard is accessible to the user. However, Pirdy makes no mention as to how the computer recognizes an input. Certainly, Pirdy does not suggest, mention, or otherwise make obvious the claim limitations of “dividing said touchpad into a plurality of regions and assigning a character to each of said regions” and “comparing said received sequence of characters with a predetermined sequence of characters”, as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.)

As both Ilan and Pirdy are silent on any aspect of the limitations of “dividing said touchpad into a plurality of regions and assigning a character to each of said regions” and “comparing said received sequence of characters with a predetermined sequence of characters”, as recited in amended independent claims 1, 12, 18, and 30, these references cannot be combined to produce the claimed limitations.

At pages 9-10 of the Office Action, claims 6, 8, and 31 are rejected under 35 USC 103(a) as being unpatentable over of Ilan in view of “Lambert” (US Patent number 6193153). However, neither of these references, when taken either singly or in combination therewith, suggest, mention, or otherwise make obvious the claim

limitations of “dividing said touchpad into a plurality of regions and assigning a character to each of said regions” and “comparing said received sequence of characters with a predetermined sequence of characters”, as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.)

As previously discussed, Ilan discloses a pattern recognition system in which a touchpad pointing device is used as a pattern input device. However, there is no mention in Ilan as to the technique used to convert the input pattern into a form that can be recognized by the computing device. Ilan shows (in Figure 4, for example) a character being traced on display, and even mentions a signal capturer (52), however, there is no mention of “dividing said touchpad into a plurality of regions and assigning a character to each of said regions” and “comparing said received sequence of characters with a predetermined sequence of characters”, as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.)

In Lambert, a method and apparatus for non-intrusive biometric capture is provided. Lambert uses a computer peripheral device (but not a touchpad) for providing a computer system with user input data and user biometric data includes an event sensing portion for detecting a user action and for converting the user input into a data first stream. However, Lambert does not suggest, mention, or otherwise make obvious the claim limitations of “dividing said touchpad into a plurality of regions and assigning a character to each of said regions” and “comparing said received sequence of characters with a predetermined sequence of characters”, as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.)

As both Ilan and Lambert are silent on any aspect of the limitations of “dividing said touchpad into a plurality of regions and assigning a character to each of said regions” and “comparing said received sequence of characters with a predetermined sequence of characters”, as recited in amended independent claims 1, 12, 18, and 30, these references cannot be combined to produce the claimed limitations.

At pages 10-11 of the Office Action, claim 20 is rejected under 35 USC§103(a) as being unpatentable over by “Ilan” (as previously mentioned herein) in view of “Pirdy” (US patent 6,151,218), and further in view of “Wilson” (US patent

number 5,901,934). However, as previously mentioned herein, neither Ilan nor Piridy, when taken either individually or in combination therewith, disclose the limitations of the Applicants' claims.

In Wilson, a retractable surface apparatus (10) is provided that may be positioned on the bottom side of any device such as a portable computer (12), a keyboard, or a drawer of a computer drawer. However, Wilson does not suggest, mention, or otherwise make obvious the limitations of "dividing said touchpad into a plurality of regions and assigning a character to each of said regions", and "comparing said received sequence of characters with a predetermined sequence of characters", as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.)

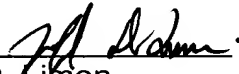
When Ilan, Piridy, and Wilson are combined, the combination does not suggest the Applicants' claimed invention since all three references are silent on the limitations of "dividing said touchpad into a plurality of regions and assigning a character to each of said regions" and "comparing said received sequence of characters with a predetermined sequence of characters", as recited in amended independent claims 1, 12, 18, and 30. (Claim language varies slightly.)

Accordingly, the Applicants respectfully requests that the Examiner withdraw all rejections to the claims and pass this application onto allowance.

**III. Additional Fees:**

It is not believed that additional fees are due at this time; however, if any additional fee is required in connection with the filing of this Amendment, please charge the fee to Deposit Account No. 08-2025.

Respectfully Submitted,  
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